

(SPACE BELOW FOR FILING STAMP ONLY)

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Appearing Specially as Attorneys for Defendant RBDM Rager, Meyer Accountancy Corp.
 named as Rager, Bell, Daskocil and Meyer
 and appearing specially and jointly as Attorneys for Defendant
 Brad Daskocil, CPA,

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

Steve Nerayoff,)	CASE NO.: C 07-03101 JW
)	
Plaintiff(s),)	DECLARATION OF STEPHANIE
)	SESSIONS PERKINS
vs.)	
)	[FILED CONCURRENTLY WITH AND IN
Rager, Bell, Daskocil and Meyer, et al. ,)	SUPPORT OF JOINT STIPULATED
)	REQUEST FOR AN ORDER
Defendant(s).)	CONTINUING CASE MANAGEMENT
)	CONFERENCE AND DEFENDANTS'
)	DEADLINE TO RESPOND TO FIRST
)	AMENDED COMPLAINT]

DECLARATION OF STEPHANIE SESSIONS PERKINS

I, STEPHANIE SESSIONS PERKINS, declare:

1. I am Senior Counsel with law firm of Chapman, Glucksman & Dean, attorneys of record for specially appearing defendants RBDM Rager Meyer Accountancy Corp. ("RBDM") and Brad Daskocil, CPA (RBDM and Brad Daskocil are herein collectively referred to as "Defendants"). If called upon to testify, I could and would competently testify to the following under oath.

1 2. Defendant RBDM was served with the Summons and First Amended Complaint in
2 this matter on or about November 26, 2007 and its response is due December 17, 2007.

3 3. Defendant Brad Daskocil, CPA was served with the Summons and First Amended
4 Complaint in this matter on or about November 26, 2007 and its response is due December 17,
5 2007.

6 4. Defendant Rossi, Daskocil & Finkelstein, LLP ("RDF") was recently named as a
7 Defendant to the action and served with the Summons and First Amended Complaint on
8 December 4, 2007 and its response is due December 24, 2007.

9 5. Counsel for Defendants and Plaintiff, Steven Nerayoff ("Plaintiff"), are currently
10 working towards non-judicial resolution of issues relative to venue and a potential tolling
11 agreement pending the outcome of Plaintiff's dispute pending in the United States Tax Court
12 and/or with the Internal Revenue Service out of which these matters arise. Counsel for
13 Defendants and Plaintiff, are evaluating the judicial efficiency of proceeding with this action,
14 regardless of venue, pending the outcome of the above-referenced United States Tax Court and/or
15 with the Internal Revenue Service matters.

16 6. Further investigation into the facts, circumstances, and issues in this case promotes
17 judicial economy and merits a continuance of 1) the Case Management Conference to January 8,
18 2008; 2) the filing of the Joint Case Management Statement to January 2, 2008; and 3)
19 Defendants' deadline to respond to the First Amended Complaint to January 8, 2007.

20 7. I have discussed the scheduling and other issues presented in this Joint Stipulation
21 with Paul E. Rice, counsel for Plaintiff and John S. Blackman, counsel for RDF and jointly for
22 Bard Daskocil. Counsel for all parties join in this request for a continuance of the Case
23 Management Conference, the deadline to file the Joint Case Management Conference Statement
24 and the deadline for Defendants to respond to the Complaint.

25 8. A previous extension of time to respond to the original Complaint was sought in
26 this case and granted affording Defendants RBDM and Daskocil until December 7, 2007 to file
27 responsive pleadings; however this date was mooted by the filing and service of the First
28

1 Amended Complaint. Defendants RBDM, RDF and Doskocil have not requested or been granted
2 any prior extensions to respond or otherwise plead to the First Amended Complaint. This
3 extension is being requested to afford the parties to this request sufficient time to investigate and
4 resolve certain matters informally, the result of which may reduce the burden to the court. In
5 addition, the naming of Defendant RDF has expanded the scope of needed investigation.

6 9. If the order the parties propose is granted, the requested continuance would have
7 the following effect on the schedule for this case:

8 (a) The date of the Case Management Conference would be continued to January 8,
9 2008.

10 (b) The date of filing of Defendants' and Plaintiff's Joint Case Management
11 Statement would be continued to January 2, 2008.

12 (c) The deadline for all Defendants' response to the First Amended Complaint
13 would be January 8, 2007.

14 I declare under the penalty of perjury and the laws of the United States that the foregoing
15 is true and correct and that this declaration was executed in Sacramento, California on this 13th
16 day of December 2007.

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18 

19 STEPHANIE SESSIONS PERKINS